

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,

v.

CIVIL ACTION  
NO: 05-10401-RCL

DELIA J. BAEZ

**AFFIDAVIT OF DEFENDANT DELIA J. BAEZ**

**I, Delia Baez on oath and affirmation depose and state the following:**

1. Over the past ten years I have maintained employment. I was likewise the owner of property through periods alleged in the complaint. In addition, I maintained businesses at various times of the complaint. Despite maintaining employment, I did not earn significant sums of money, was not wealthy and was not trying to cheat the government for assistance to benefit herself.
2. As referenced in the enclosed attachments I was appointed the legal guardian for two young children in the Essex Superior Court before the time of the complaint activity alleged in this case. The children were abandoned by the mother. The father was and still is serving a prison sentence.
3. The enclosed attachments indicate that I cared for, fed, clothed, provided shelter and served as the lone parent to two children who otherwise would have been eligible for the above referenced benefits under most circumstances. In fact I provided a warm and loving household to two abandoned children who otherwise would have become wards to the state.
4. The children still live with me.

5. Again with respect to medical assistance, I applied for and received medical assistance in part for me, however the majority of care was sought and given to a sick and ill friend, who was indigent and received the benefit of the medical assistance.

6. The two orphaned children also received these benefits over time.

7. Food stamps were utilized to provide for the sick and unemployed friend and were also used to provide for the children.

8. I did not benefit directly from housing assistance. My sick, unemployed and indigent housemate and two children for whom I am the legal guardian to, received this benefit also. At the time alleged in the complaint I was not always financially solvent or making money from businesses to a profit, and the housing was necessary for parties who otherwise would have been eligible for the assistance.

**Signed under the penalties of perjury this twentieth day of December, 2007**

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**Delia Baez**